

6.0 GENERAL PRACTICES REVIEW

Part I Overall Findings and Recommendations

6.1 Reasonable Program Modifications and General Practices

The ADA states that a) a public entity may not deny a qualified individual with a disability an opportunity to participate and benefit from any program; b) a public entity may not afford an opportunity that is not equal to or not as effective as that provided others; and c) a public entity may not impose eligibility criteria for participation in programs that screen out people with disabilities either directly or indirectly, unless such criteria are necessary for the provision of the programs's activities or services.

Public entities are required to make reasonable modifications to policies or practices in order to avoid discrimination towards people with disabilities. A modification is not required, however, if it would fundamentally alter the nature of the program or activity.

Reasonable Program Modifications

Findings: The Department of Parks and Recreation does not have established procedure and criteria for determining reasonable program modifications to achieve program accessibility. In the absence of departmental policy or procedure, a consistent approach for determining reasonable program modifications for all Department programs and services is lacking.

There is a procedure developed within the Park Maintenance and Recreation Services Division's Children and Youth Manual which was distributed in May 1999. This procedure states:

The DPR will make reasonable program modifications for the inclusion of people with disabilities in recreation activities. The individual, parents of the child and the Program Director will meet to discuss the child's individual needs and what, if any, adaptations are needed. The Program Director will determine what program modification can be reasonably provided to accommodate those needs. If a mutually satisfactory agreement cannot be reached with the individual and/or parents, the Program Director will consult the Therapeutic Recreation Unit and the District Recreation Supervisor for the final decision.

All of the PMRS Division recreation directors are aware that

program modifications may be necessary to include or enable a person with a disability to participate or benefit from programs. Some staff do this on their own, others may call the Therapeutic Recreation Unit for assistance.

A little over 77% of the recreation directors stated they felt the public was informed that the Department is prepared to make reasonable modifications to make its programs accessible. If asked, the recreation directors are aware and will verbally give information about reasonable program modifications. Over 63% of the recreation directors are aware of the PMRS Policy for responding to requests for reasonable program modifications. All the directors use some informal or formal process for responding to requests. If staff cannot respond at the "line level" they call their supervisor or Therapeutic Recreation for assistance.

In the Beautification Division and the remaining administrative and support divisions of the Department, some staff are aware of the requirement to make reasonable modifications to programs and policies. However, the staff acknowledged a lack of consistency and guidance in implementing reasonable modifications.

6.1.1 Department Practices Which Require Modification

There are no stated Department policies or practices which may tend to screen out persons with disabilities from participation in programs and services. However, a general lack of understanding of ADA requirements and a lack of a clear plan and procedure for addressing those requirements may result in discouraging persons with disabilities from participating. There is an overall desire and willingness on the part of the Department to improve efforts to make its benefits, programs and services accessible.

Action:

1. Develop criteria for determining reasonable modifications to provide program accessibility. DPR will also have to determine which modifications would fundamentally alter the nature of the program or result in undue financial and administrative burden. This would be of concern in those DPR programs that are linked to unique sites such as Hanauma Bay Nature Park and the botanic gardens.

The PMRS Policy for determining reasonable modifications in its Children and Youth Program Manual can be expanded and clarified to be applicable to all DPR programs. The Therapeutic Recreation Section is tasked with developing the

proposed procedures.

2. Develop an access policy and implementation manual which clearly sets forth policy and instruction to staff on the overall requirements and procedures for implementing reasonable modifications. The manual should also cover topics such as handling requests, complaints and grievances. A resource section for making information available in alternate formats is to be included.

6.1.2 Eligibility Criteria

Eligibility criteria was found to exist based on age (children and senior programs) and skill (swimming programs). These criteria were found to be necessary to operate the program or activity.

Action:

1. The DPR policy and implementation manual should include a clear policy on eligibility criteria to ensure that persons with disabilities are not directly or indirectly discriminated against.

6.2 General Publicity and Advertising

Findings: There is a need for increased outreach to persons with disabilities to inform the public about the reasonable modifications the Department will provide to make its programs and services accessible. The Park Maintenance and Recreation Services Division has adopted a policy to include an access statement in publicity flyers, posters and newspaper ads.

The Department of Parks and Recreation, City & County of Honolulu is committed to making all its programs and leisure services accessible to everyone, including persons with disabilities. If you have need for reasonable modifications, please call your local park or the Therapeutic Recreation Unit at 522-7034. VI

This is generally used for specific program activities which change seasonally. However, there is a lack of general information educating and informing persons with disabilities about the overall availability of parks, parks facilities, and recreation programs and services. There is also a need to consistently include access information in all communications

including invitations, meeting notices, and park use permits. Some units of DPR do this and others do not.

Most of the fliers and publicity include the International Symbol of Access and the Department's Access Statement. People who receive fliers without this information, who never see DPR's printed information or who do not read print would not be aware of this information. It should also be noted that DPR publicity and advertising is predominantly in printed text, but DPR also has a website and is expanding information on accessibility for park users.

Action:

1. Provide an access policy and implementation manual to all divisions/sections/program personnel to ensure that access information in publicity and advertising is handled in a consistent manner throughout the Department.
2. Increase outreach to persons with disabilities by using alternate formats for communicating with persons with disabilities rather than just printed text. Increased radio and television publicity is recommended to reach a wider audience.
3. Publicize the Department's programs and services through organizations that work with persons with disabilities or whose membership is predominantly made up of persons with disabilities.
4. Include the Department's Non-discrimination Policy or similar statement in all general informational publications; provide a poster-size format of the policy and post it in all public park locations.
5. Ensure that all announcements and applications include:
 - Policy of Non-discrimination
 - Information on site accessibility (accessible restrooms, parking, bus routes, meeting rooms, etc.)
 - TDD/TTY phone number for information or requests for assistance
 - Availability of alternate formats
 - A reasonable deadline for requests, if necessary.
6. Expand available information on the DPR website to include accessible program sites, TDD numbers, accessible campsites, availability of all-terrain wheelchairs, etc.

6.3 Visual Communication

Findings: Information on programs and services is predominantly communicated in print media such as printed flyers, brochures, notices, newspaper ads, forms, handbooks, and visual displays. Staff are generally not aware that information in alternate formats such as large print, Braille, audio tape, verbal descriptions/readers, pictorial signage, and computer disk should be made available upon request.

Interpretive and educational program displays of a permanent and semi-permanent nature are installed at Hanauma Bay Nature Preserve and some botanic gardens. Some temporary exhibits are occasionally assembled such as at special events or shopping centers. These rely mainly on information communicated visually in text or pictures.

Video programs have been created on occasion, such as the public service announcement for the 1999 Summer Fun Program. The 1999 video did include closed captioning for persons with hearing disabilities.

The copier machines at PMRS district offices and the main office at the Honolulu Municipal Building have enlarging capabilities to produce large print documents.

Action:

1. Provide an access policy and implementation manual to all divisions/sections/program personnel to ensure that there is a clear understanding among staff of the requirement to provide information in alternate formats.
2. Publications should carry the notice that: *This publication can be made available upon request in alternate formats. Call _____ for assistance.* Determine which alternate formats may be prepared and available, and which would be handled on an individual basis.
3. Improve design of visual displays to incorporate alternate formats for communicating information. For example, minimum font size for printed information; verbal descriptions or taped information; and pictorial signage can be attractively incorporated into displays.
4. Develop DPR capabilities to provide alternate formats by identifying equipment that can be purchased, borrowed and shared and establishing contracts for communication services

that can be used throughout the Department.

6.4 Aural/Oral Communication

(NOTE: See definitions, Chapter 3)

Findings: Auxiliary aids and services are those designed to provide effective communications, i.e., making aurally and visually delivered information available to persons with hearing, speech, and vision impairments.

The Department has in place a contract for sign language interpreters when needed. However, it was found that staff are generally not familiar with its availability and procedures for implementation. Other auxiliary aids include assistive listening devices, paper and pen, closed captioning for video programs, and telecommunication devices (TDD/TTY), but staff do not know how to use/obtain them.

The Department has two TDD machines. One is located at the main office and the Honolulu Municipal Building, and one is located at the PMRS TR Unit Office. There is general reliance on the free relay service provided by GTE Hawaiian Tel.

Action:

1. Provide an access policy and implementation manual to all divisions/sections/program personnel to ensure that staff are able to provide alternate formats when requested.
2. Provide a sign language interpreter (and include that information in publicity) for all major special events without waiting for an individual request.
3. Provide TDD and staff training at all key program offices including:
 - 4 PMRS District Offices (East Honolulu, West Honolulu, Leeward/Central Oahu, and Windward Oahu)
 - Beautification Division Office
 - Foster Botanical Garden
 - Ho'omaluhia Botanical Garden
 - Park Maintenance and Recreation Services Administration
 - Personnel Services Office
 - Parks Permit Section (under Department of Information and Complaint)
 - Kapiolani Regional Park
 - McCoy Pavilion

4. List the TDD numbers in the telephone book.
5. Develop DPR capabilities to provide alternate formats by identifying equipment that can be shared and assigned to a resource unit. Identify and develop community resources from which equipment may be borrowed.
6. Establish contracts for communication services that can be used throughout the Department.

6.5 Staff Training

Findings: The Park Maintenance and Recreation Services Division, has had a Therapeutic Recreation Unit since 1979 and has adopted the LIFE (Leisure is for Everyone) concept of inclusion for its programs and activities. The TR unit has provided the division with valuable resource development and support, and has extended the LIFE training classes to other divisions of the Department.

LIFE training is focused primarily on sensitivity and awareness of working with persons with disabilities. However, the majority of staff surveyed (including PMRS staff) expressed the need for more and improved training. While staff are generally aware of the need to make programs accessible, they are not sure of the means, methods, specific requirements, and procedures for making reasonable program modifications or information available in alternate formats.

Action:

1. Develop a training plan to ensure that all employees receive appropriate and adequate training to ensure accessible programs and services. The training plan should identify the types of training needed by staff depending on their responsibilities, i.e., maintenance personnel, program staff, and customer service staff.
2. All department staff should receive basic LIFE program training, including volunteers and part-time staff.
3. Develop and provide an access policy and implementation manual to all divisions/sections/program personnel to ensure that access policy and procedure is known and implemented in a consistent manner throughout the Department.

6.6 Contracts, Concessions, Permit Holders

Findings: DPR does not include specific contract language that

requires its contractors, concessionaires, and permit holders to make programs and services accessible.

Action:

1. Develop through rule making or contract language requirements for ADA compliance whenever programs or services are provided on behalf of, or in conjunction with, the DPR or through the use of properties under its control.
2. Ensure that the above mentioned programs have accessible advertising and that the entities are prepared to make reasonable modifications.

6.7 Emergency Evacuation Procedures

Findings: With the exception of Hanauma Bay Nature Preserve, where emergency evacuation procedures are in place and have been put into practice, other Department divisions/programs do not have procedures that take into consideration the safe evacuation of persons with disabilities.

Action:

1. Develop overall guidelines and staff training for emergency evacuation of persons with disabilities addressing different types of emergencies and different disabilities. These can then be used by each program unit/site to develop its specific evacuation plan.
2. Review the staff role as civil defense emergency shelter managers to make sure that the needs of persons with disabilities are taken into consideration.

6.8 Surcharges and Additional Requirements

Findings: There are no circumstances that would require a person with a disability to pay a fee or surcharge not required by other participants. It has been noted in the prior section discussing the assessment of Department rules and regulations that where fees for copies are established, the recommendation is that those documents should be made available in alternate formats on request, and a fair fee schedule be established. State guidelines can be adopted.

6.9 Procurement Contracts

Findings: In selecting contractors or vendors, a public entity may not discriminate on the basis of disability. The Department follows procurement procedure, policy, and practice as set forth by State law, ordinance, and established by the Department of Budget and Fiscal Services which processes all contractor and vendor contracts.

6.10 Licensing and Certification

Findings: The Department does not issue any licenses or certificates to individuals. The Department's swim instructors who are trained and certified by the American Red Cross (ARC) issue ARC aquatics certificates in swimming and lifesaving. The DPR will provide reasonable program modifications.

6.11 Ongoing Accessibility Improvements and Compliance Program

Findings: The responsibilities for developing and carrying out the Department's program for ADA compliance are not clearly established within the Department. Over the past ten years, various staff have been assigned to projects and program components having to do with meeting ADA requirements. Increasingly, the need to develop a comprehensive, working program for compliance and ongoing accessibility improvements has become apparent.

Action:

1. Designate a Department ADA coordinator who will be responsible for the overall compliance program. The coordinator should be someone who:
 - Has direct access to and accountability to the Director of the Department.
 - Has sufficient training and background to administer the program.
 - Will act as liaison to the DPR Access Advisory Council.
 - Will act as liaison to the City's ADA Committee.
 - Will chair the DPR ADA committee consisting of representatives from each division.
 - Will coordinate and update the DPR Transition Plan.
2. The Department ADA Coordinator will reactivate the DPR ADA Committee consisting of representatives from each division. The purpose of the committee would be to coordinate, plan, and evaluate accessibility efforts in training, publicity and communication, policy and practice, physical barrier removal, etc.

Part II Division Reports

6.12 Management Services Division (MS)

Findings: The Management Services Division provides administrative and support services to the Department in budget management; long-range planning; management research and analysis; computer systems analysis; property inventory and supply management; and purchasing. The division is also responsible for the overall administration of the use of parks and recreational facilities, including administration of park concession agreements, the issuance of park permits, and the development and enforcement of parks rules and regulations.

The Department of Customer Services (DCS) assumed responsibility for the former Parks Permit Section in the 1998 City reorganization. Some of the recommendations for improving communications and access to services will have to be requested and implemented by MS through that department.

Action:

1. Install a TDD at the Parks Permit Section and provide staff training.
2. Review all parks concession permits and agreements to ensure that contractors meet the requirements of ADA, Title II when they provide programs and services on behalf of the City.
3. Implement recommended changes to rules and regulations (see Section 5.2).

6.13 Personnel Services Office

Findings: The Personnel Services Office is responsible for developing personnel policies and procedures; reviewing and advising personnel actions; advising divisions on labor relations and collective bargaining matters; administering employee training and safety programs; and for payroll preparation activities.

Staff provide "counter service" to employees as well as general reception duties at the entry to the Department's headquarters at the Honolulu Municipal Building, 10th floor.

Action:

1. The Personnel Office counter is not accessible to persons in wheelchair. Modifications or accommodation should be planned/implemented.
2. Staff need training in operating the TDD situated at the reception desk and LIFE training (sensitivity and awareness of persons with disabilities) to improve customer service and accessibility to the Department's programs and services.

6.14 Park Maintenance and Recreation Services Division (PMRS)

Findings: The PMRS Division is responsible for developing and implementing community recreation and leisure programs, and for maintaining recreational facilities that are attractive, clean, and safe. Division operations are carried out through four geographic districts (East Honolulu, West Honolulu, Leeward-Central Oahu, and Windward Oahu) and a Recreation Support Services Branch.

Professional recreation staff plan and implement organized recreation programs in Spring, Summer and Fall Programs, seasonal and annual special events, and ongoing club or year-round programs. In addition, the division manages and maintains over 200 park properties island wide including beach parks, campsites, regional, district, community and neighborhood parks, as well as numerous malls, beach rights-of-way, traffic islands, and medial strips throughout the island.

Major Organized Programs include the following:

People's Open Market: Nearly a million customers a year frequent twenty-two weekly sites on Oahu. They are attracted by fresh and sometimes hard-to-find local fruits and vegetables at below retail prices. All sites are situated in public parking lots which are closed off for market purposes at the weekly time. Whenever parking stalls for persons with disabilities are displaced by the market, substitute stalls are temporarily designated. Staff have been advised as to the correct space requirements and appropriate location for substitute stalls.

Organized Community Recreation Program: Activities in physical fitness, arts and crafts, music and dance, sports and games are offered during Spring, Summer and Fall program periods at approximately seventy-nine sites throughout the island. These are activities planned, executed, and supervised by DPR staff or independent contractors.

Summer Fun: Over 11,000 children participate in this

recreational child care program which provides opportunities to develop social and physical skill, enhance self esteem, and learn healthy lifestyles. Approximately sixty programs are offered yearly.

Because this program has the single largest enrollment of any activity offered by DPR, the requests for reasonable modifications have tended to be most closely associated with the children's program. The Division's Therapeutic Recreation Unit has been actively training and assisting the program directors. The PMRS Children and Youth Manual includes a procedure on handling requests for reasonable modifications. (See Part I, Overall Findings and Recommendations) It also addresses the issue of personal care.

Aquatics Program: Aquatic activities are offered at eighteen municipal pools. Sixteen of the pools offer at least one mode of access, i.e., lift, ramp, or stairs. McCully Swimming Pool and Aiea Swimming Pool are not accessible.

Senior Citizens: Forty-eight recreation clubs for senior citizens, fifty-five years and older, provide programs and social activities for their physical, emotional, and mental well-being. Clubs generally plan and implement their own weekly meetings. Special events such as the Senior Citizens Valentine Dance and Mayor's Cultural Festival are held annually for club participation.

Volunteers in Parks: Over 3,000 individuals donate their time and services to park programs. These include Junior Leaders in the Summer Fun Program to maintenance helpers at different parks. Volunteer organizations and individuals also sign "Adopt-A-Park" agreements to help maintain park lands for the enjoyment of all.

Action: Separate Programs for Disabled

Under ADA Title II, separate programs or activities for the disabled are permitted only when necessary to ensure equal opportunity. When separate programs are provided, qualified persons with disabilities still cannot be excluded from participating in regular programs. It is the department's position that participants of DPR programs, services and activities shall not be denied the opportunity to participate in a regular (integrated) program even though another separate program may exist.

PMRS has several programs that are considered separate programs for people with disabilities:

1. Moanalua and Kailua District Park pools offer water exercise therapy classes for people with disabilities. These classes are run at slower pace to accommodate the participants. Some of the participants also require adapted equipment and/or physical assistance in the water. Although the Department provides some of the adapted equipment and depend on volunteers to provide assistance, the participants are also responsible for providing some of the adapted equipment and their own assistant.

2. Kalakaua District Park and Kailua District Park have exercise programs that utilize weights as well as some adapted equipment for people with disabilities. Some of the participants require physical assistance. Both programs individualized the exercises to meet the participants' needs. Although there are volunteers to assist, the participants are responsible for providing their own assistant.

3. PMRS started some separate social recreational programs in the 1970's and 1980's which are still in existence today. When the ADA was enacted, Recreation Directors were encouraged to make these programs inclusive rather than separate. The programs are as follows:

A. S.T.A.R. (Special Teen and Adult Recreation) program at Kaimuki Community Park was focused on providing recreational opportunities for people who are mentally challenged.

B. PATH (Program Activities for The Healthy) was originally started to provide recreational opportunities for teens and adults with disabilities. It is now a social/recreational club in which members determine the schedule of activities.

C. WISP (Windward Special People) program at Kailua District Parks was originally started by parents with teen and adult children who were mentally challenged. The program had facility usage at the park and in the late 1980's the program was taken over by the TR Unit staff.

D. The Fun and Fitness program at Kailua District Park is for teenagers who participate in recreational activities of their choice. As a group, the participants decide what kinds of recreational activities they want to do during the program sessions.

Since the adoption of the LIFE concept, all programs have dropped the "special" designation and are open to all persons. However, since the programs originated specifically for people with disabilities, there has been limited success in achieving "reverse inclusion". Attempts to find other organizations to

take over these programs have been unsuccessful.

The division has taken a position that no new separate programming will be developed for persons with disabilities. The emphasis is to make all programs inclusive.

It is recommended that as long as there is sufficient interest, the STAR, PATH, WISP, and Fun and Fitness programs should be continued. It is also recommended that staff continue to seek other organizations that may be able to take over the program(s) or to assist some to operate independently.

Action: Aquatics Programs and Services

1. Staff need ongoing training in maintenance and use of equipment and how to provide assistance to swimming pool users, particularly with regards to the use of lifts and wheelchairs. The Therapeutic Recreation Section is tasked with developing a training plan and schedule.
2. McCully and Aiea Swimming Pools should be re-evaluated for accessibility and placement on the transition plan priority list.
3. Aquatic staff need additional training for inclusion of persons with disabilities in swimming and other aquatic activities. Guidelines for making program modifications in aquatics activities should be included in the Departmental access manual (recommended earlier).

Action: People's Open Market

1. Make sure that vendors are informed of requirements of Title II, ADA.
2. A signal horn is used to start and end market sales at each site. Alternate forms of communication should be explored to communicate with persons with hearing disabilities.
3. A Open Market Hotline gives recorded days, times, and locations for markets. A TDD number should be available where the same information can be accessed by persons with hearing disabilities.

Action: Hanauma Bay Nature Preserve Education Program

1. The interpretive/educational displays rely on text and pictures, and some three dimensional objects. Alternate means of communication for persons with visual disabilities

is recommended to make the information accessible.

2. Some guided walks are in areas where it is not desirable nor feasible to modify the environment to make the program accessible. To do so would alter the nature of the activity. Therefore, some means of ensuring an equal benefit to persons with disabilities is necessary. Focus groups, consultation with experts, and/or assistance from the DPR Access Advisory Council may provide some creative solutions.

Action: Beach Access

1. PMRS should re-evaluate maintenance and management of the all-terrain wheelchairs and beach mats assigned to the respective districts. The Beach Access Task Force expressed continued concern regarding this problem.
2. Follow-up on Beach Access Task Force recommendation to explore expansion of all-terrain wheelchairs program to campsites.

Action: Priorities for Accessible Facilities

1. The current Transition Plan for compliance with ADAAGS for barrier removal will be updated. The division should re-evaluate the priorities assigned to parks. The past priorities were based on level of usage, recreational opportunities and geographic location. Furthermore, work on outdoor recreational facilities was generally deferred because design standards were not in place.
2. Take into consideration unique recreational opportunities or cases in which DPR limits certain activities to certain parks. The Koko Head Shooting Ranges is an example. It is the only facility of its kind on the island, and therefore, it should receive a higher priority for renovation or reconstruction to meet ADA accessibility standards.

6.15 Beautification Division

Findings: The Beautification Division is responsible for propagating, planting and maintaining City trees; landscaping along public roadways, parks and malls; and an islandwide beautification program. It reviews and inspects subdivision plans and other street tree planting; issues permits on special requests for planting, pruning, relocating and removing street trees; clears hazardous trees and provides 24-hour emergency

response for tree problems such as blocked streets or damaged property; and grows and maintains ornamental plants for City functions; develops field specimens, tree banks, and maintains trees for City projects.

The Beautification Division is headquartered at the DPR Nursery at Kapiolani Regional Park. Although the Honolulu Botanical Gardens is a sub-unit of the Beautification Division, its complexity merits a separate section which follows.

Action:

1. Ensure that contractors that provide tree trimming and beautification services on behalf of the City are made aware of ADA Title II requirements.
2. Staff need LIFE training to understand how their activities may affect and impact programs and services of the Department.

6.16 Honolulu Botanical Gardens (HBG)

Findings: HBG oversees five botanical gardens in Oahu.

Foster Botanical Garden
50 North Vineyard Boulevard
Honolulu, Hawaii 96817

Liliuokalani Botanical Garden
1632 Waikahalulu Lane
Honolulu, Hawaii 96817

Ho'omaluhia Botanical Garden
45-680 Luluku Road
Kaneohe, Hawaii 96744

Wahiawa Botanical Garden
1396 California Avenue
Wahiawa, Hawaii 96786

Koko Crater Botanical Garden.
400 Kealahou Street
Honolulu, Hawaii 96825

The primary responsibility of the botanical gardens is to plan, develop, curate, maintain and study documented collections of tropical plants in an aesthetic setting for the purposes of conservation, botany, horticulture, education and passive

recreation. To this end, the gardens are "living" museums that provide visitors with an enriching educational and recreational experience.

The HBG also oversee the following programs:

1. Community Recreational Gardening: Currently there are eleven community gardens on the island. Each garden has a garden organization which manages the respective site. These sites allow individuals the opportunity to grow their own vegetables/fruits. Only the Manoa site is accessible to persons in wheelchairs.

2. Exceptional Tree Program: This program was established to protect "exceptional trees" by reason of age, rarity, location, size, aesthetic quality, endemic status or historical and cultural significance. The program maintains a catalog of trees and periodically inspects and treats the unique specimens.

3. Educational/Interpretive Programs: Various programs and services are offered at the different gardens, ranging from classroom activities at Foster Botanical Garden to simple plant labeling at Koko Crater Botanical Garden. "Catch and Release Fishing" is a regular event at the man-made lake in Ho'omaluhia Botanical Garden. Family fishing day is scheduled for the first weekend of each month.

4. Friends of Honolulu Botanical Gardens: The Friends of Honolulu Botanical Gardens, a non-profit support organization, assists the gardens in presenting additional activities and special events to further the goals and mission of the gardens' programs. The Friends organization conducts major special events such as the Annual Foster Garden Plant Sale and Mid-Summer's Night Gleam. It also operates a gift shop at Foster Botanical Garden.

5. Garden Tours: Tours are provided as requested at Ho'omaluhia Botanical Garden and Monday through Friday at 1:00 p.m. at Foster Botanical Garden. Garden tours are provided by volunteers who have been trained as docents.

6. Volunteer Program and Docent Training: There are over 150 volunteers in the Honolulu Botanical Gardens system. They assist with a multitude of support services, from grounds maintenance to staffing visitor centers. Training for docents at Foster Botanical Garden is held annually for new docents and as a refresher course for all continuing docents.

Action:

1. Ensure that the Friends of Honolulu Botanical Gardens, in its various activities at the gardens, are aware of the requirements of ADA, Title II. Offer LIFE training to the organization's officers and committee chairpersons.
2. Include LIFE training for docents and volunteers.
3. Similar to Hanauma Bay Nature Preserve, some guided walks in the gardens are in areas where it is not desirable nor feasible to modify the environment to make the program accessible. To do so would alter the nature of the activity. Therefore, some means of ensuring an equal benefit to persons with disabilities is necessary. Focus groups, consultation with experts, and/or assistance from the DPR Access Advisory Council may provide some creative solutions.
4. Each of the botanical gardens is an unique environment, and they are in widespread locations. The feasibility of moving activities from one garden to another is limited. Some general horticultural classes might not be site dependent, but other activities, such as a garden tour, are site specific. DPR should re-evaluate the priority listing of the botanical gardens in its Transition Plan. It is also recommended that HBG develop a program access plan for each of the botanical gardens.
5. Because the operations of the Community Gardens Program are established in DPR Rules and Regulations, comments and recommendations are made in that section (Section 5.2, No. 20). None of the sites is considered accessible to persons in wheelchairs. At some gardens, parking and restrooms are also not available. The original premise of the program was to make underused or undeveloped park property available for this activity. DPR provides the land, irrigation, and overall management of the program. However, considering the broad interpretation of program and service afforded under the ADA, Title II, it is recommended that the community gardens be re-evaluated for accessibility. For example, while it may not be necessary for every community garden to have wheelchair access, HBG should develop an access plan for this program to take into consideration usage, geographic locations, and availability of parking and restrooms.

6.15 Maintenance Support Services Division (MSS)

Findings: The MSS Division is responsible for constructing,

renovating, repairing, servicing, and maintaining park buildings, grounds and other recreational facilities. It manages programs for preventive maintenance and service contracts; chemical and fertilizer applications; and heavy equipment support. Division personnel in carpentry, masonry, painting, plumbing, and welding trades do repairs and minor renovations island wide.

Action:

1. Ensure that contractors that provide maintenance and repair services on behalf of the City are made aware of ADA Title II requirements.
2. Staff need LIFE training to understand how their activities may affect and impact programs and services of the Department.